

EXHIBIT “A-7”

JULIO GARZA
NATIONAL OILWELL VARCO V. GARZA

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45-48

<p style="text-align: right;">Page 45</p> <p>1 Q. (BY MR. LAPP) So you don't dispute in 2 this case that some of the information that you 3 took with you when you left NOV is company 4 confidential information. 5 MR. ISRAEL: Object to form. 6 A. According to the definition, yes. 7 Q. (BY MR. LAPP) So you don't dispute 8 that. 9 A. No, according to definition. 10 Q. So what you're disputing is the 11 definition, not the fact that you took the 12 information; is that right? 13 A. Correct. 14 Q. Okay. So if, in fact, it turns out in 15 this case that NOV's definition squares up with 16 the legal definition, your quibble would go away, 17 would it not? 18 MR. ISRAEL: Object to form. 19 A. I would have to think about it. I'm 20 not a lawyer, sir, so it's hard for me to make 21 that judgment. 22 Q. (BY MR. LAPP) Okay. And I'm not 23 asking you to make that judgment. I'm asking you 24 to answer the question. The question is that if 25 it turns out that NOV's definition, as you recall</p>	<p style="text-align: right;">Page 47</p> <p>1 your Array-issued laptop, did you not? 2 A. That's correct. 3 Q. And what -- for what purpose did you 4 plug those thumb drives into the Array laptop? 5 A. I have some reference information, like 6 calculators, as I mentioned earlier. 7 Q. Same thumb drive that the NOV 8 confidential information is on? 9 A. Correct. 10 Q. Now, we've talked about, not this 11 morning, but there are two USB thumb drives that 12 you indicated in answers to interrogatories to 13 the best of your recollection were plugged in the 14 NOV environment and also plugged in the Array 15 environment. 16 A. I believe there was only one, but I 17 gave the other thumb drive that was utilized at 18 NOV as instructed. 19 Q. Okay. And the one -- and I think we 20 called it the subject device or the -- 21 A. Yeah. 22 Q. -- the one on which the information 23 subject to, that's a black or gray USB with a 24 snap-on lid, as I recall. 25 A. Yes.</p>
<p style="text-align: right;">Page 46</p> <p>1 it, on the intellectual property and 2 confidentiality agreement that you signed squares 3 up with the legal definition of confidential 4 information, you agree that you then took 5 confidential information from NOV, correct? 6 MR. ISRAEL: Object to form. 7 A. I would have to agree, yeah. 8 Q. (BY MR. LAPP) You didn't tell anybody 9 at NOV, Mr. Whitnell, or anybody else, that you 10 were taking that information when you left, did 11 you? 12 A. No. 13 Q. You didn't seek permission from NOV to 14 take that information, did you? 15 A. No. 16 Q. When you realized that you had that 17 information and that NOV didn't think that was a 18 very good idea, you didn't take any steps to try 19 to give it back, did you? 20 A. I didn't think about it, sir. It was 21 information on my thumb drive. It was still 22 within my possession and it was still 23 confidential because it was not shared. 24 Q. Now, in fact, you plugged one or two 25 thumb drives that you took with you from NOV into</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Okay. And the other one that may have 2 been said stress engineering, something like 3 that, correct? 4 A. Yes, correct. 5 Q. And just so we're all clear and 6 understand, as I understand your testimony, it's 7 the -- it's the first one, the black with the 8 snap-on lid, that is the subject device. 9 A. Correct. 10 MR. LAPP: Let's go off. 11 THE VIDEOGRAPHER: We're off the 12 record. The time is 10:20. 13 (Recess taken 10:20 to 10:22) 14 THE VIDEOGRAPHER: We're back on 15 the record. The time is 10:22. 16 Q. (BY MR. LAPP) Mr. Garza, with regard 17 to the information that was on the subject flash 18 drive, you did not obtain permission to take it 19 before you took it, correct? 20 A. I had permission to have access to it. 21 Q. That's not the question I asked you. 22 A. Right. 23 Q. The question I asked you was you didn't 24 obtain permission to take it from NOV when you 25 left, did you?</p>

plugged UBS
into Array
computer

IMPEACH